

1 BORIS FELDMAN, State Bar No. 128838  
2 Email: boris.feldman@wsgr.com  
3 ELIZABETH C. PETERSON, State Bar No. 194561  
4 Email: epeterson@wsgr.com  
5 CHERYL FOUNG, State Bar No. 108868  
6 Email: cfoung@wsgr.com  
7 DIANE M. WALTERS, State Bar No. 148136  
8 Email: dwalters@wsgr.com  
9 BRYSON S. SANTAGUIDA, State Bar No. 255173  
10 Email: bsantaguida@wsgr.com  
11 WILSON SONSINI GOODRICH & ROSATI  
12 Professional Corporation  
13 650 Page Mill Road  
14 Palo Alto, CA 94304-1050  
15 Telephone: (650) 493-9300  
16 Facsimile: (650) 565-5100  
17

18 *Attorneys for Defendants and Nominal Defendant  
19 Google Inc.*

20  
21  
22  
23  
24  
25  
26  
27  
28  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

29 In re GOOGLE INC. SHAREHOLDER ) Master File No. CV-11-04248-PJH  
30 DERIVATIVE LITIGATION )  
31 \_\_\_\_\_ )  
32 This Document Relates To: ) STIPULATION AND [PROPOSED]  
33 ) ORDER REGARDING ADR  
34 ) CERTIFICATION AND  
35 ) SELECTION PROCESS  
36 ALL ACTIONS ) DATE: N/A  
37 ) TIME: N/A  
38 ) JUDGE: Hon. Phyllis J. Hamilton  
39 \_\_\_\_\_ )  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100  
101  
102  
103  
104  
105  
106  
107  
108  
109  
110  
111  
112  
113  
114  
115  
116  
117  
118  
119  
120  
121  
122  
123  
124  
125  
126  
127  
128  
129  
130  
131  
132  
133  
134  
135  
136  
137  
138  
139  
140  
141  
142  
143  
144  
145  
146  
147  
148  
149  
150  
151  
152  
153  
154  
155  
156  
157  
158  
159  
160  
161  
162  
163  
164  
165  
166  
167  
168  
169  
170  
171  
172  
173  
174  
175  
176  
177  
178  
179  
180  
181  
182  
183  
184  
185  
186  
187  
188  
189  
190  
191  
192  
193  
194  
195  
196  
197  
198  
199  
200  
201  
202  
203  
204  
205  
206  
207  
208  
209  
210  
211  
212  
213  
214  
215  
216  
217  
218  
219  
220  
221  
222  
223  
224  
225  
226  
227  
228  
229  
230  
231  
232  
233  
234  
235  
236  
237  
238  
239  
240  
241  
242  
243  
244  
245  
246  
247  
248  
249  
250  
251  
252  
253  
254  
255  
256  
257  
258  
259  
260  
261  
262  
263  
264  
265  
266  
267  
268  
269  
270  
271  
272  
273  
274  
275  
276  
277  
278  
279  
280  
281  
282  
283  
284  
285  
286  
287  
288  
289  
290  
291  
292  
293  
294  
295  
296  
297  
298  
299  
300  
301  
302  
303  
304  
305  
306  
307  
308  
309  
310  
311  
312  
313  
314  
315  
316  
317  
318  
319  
320  
321  
322  
323  
324  
325  
326  
327  
328  
329  
330  
331  
332  
333  
334  
335  
336  
337  
338  
339  
340  
341  
342  
343  
344  
345  
346  
347  
348  
349  
350  
351  
352  
353  
354  
355  
356  
357  
358  
359  
360  
361  
362  
363  
364  
365  
366  
367  
368  
369  
370  
371  
372  
373  
374  
375  
376  
377  
378  
379  
380  
381  
382  
383  
384  
385  
386  
387  
388  
389  
390  
391  
392  
393  
394  
395  
396  
397  
398  
399  
400  
401  
402  
403  
404  
405  
406  
407  
408  
409  
410  
411  
412  
413  
414  
415  
416  
417  
418  
419  
420  
421  
422  
423  
424  
425  
426  
427  
428  
429  
430  
431  
432  
433  
434  
435  
436  
437  
438  
439  
440  
441  
442  
443  
444  
445  
446  
447  
448  
449  
450  
451  
452  
453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464  
465  
466  
467  
468  
469  
470  
471  
472  
473  
474  
475  
476  
477  
478  
479  
480  
481  
482  
483  
484  
485  
486  
487  
488  
489  
490  
491  
492  
493  
494  
495  
496  
497  
498  
499  
500  
501  
502  
503  
504  
505  
506  
507  
508  
509  
510  
511  
512  
513  
514  
515  
516  
517  
518  
519  
520  
521  
522  
523  
524  
525  
526  
527  
528  
529  
530  
531  
532  
533  
534  
535  
536  
537  
538  
539  
540  
541  
542  
543  
544  
545  
546  
547  
548  
549  
550  
551  
552  
553  
554  
555  
556  
557  
558  
559  
550  
551  
552  
553  
554  
555  
556  
557  
558  
559  
560  
561  
562  
563  
564  
565  
566  
567  
568  
569  
570  
571  
572  
573  
574  
575  
576  
577  
578  
579  
580  
581  
582  
583  
584  
585  
586  
587  
588  
589  
580  
581  
582  
583  
584  
585  
586  
587  
588  
589  
590  
591  
592  
593  
594  
595  
596  
597  
598  
599  
590  
591  
592  
593  
594  
595  
596  
597  
598  
599  
600  
601  
602  
603  
604  
605  
606  
607  
608  
609  
610  
611  
612  
613  
614  
615  
616  
617  
618  
619  
620  
621  
622  
623  
624  
625  
626  
627  
628  
629  
630  
631  
632  
633  
634  
635  
636  
637  
638  
639  
640  
641  
642  
643  
644  
645  
646  
647  
648  
649  
650  
651  
652  
653  
654  
655  
656  
657  
658  
659  
660  
661  
662  
663  
664  
665  
666  
667  
668  
669  
660  
661  
662  
663  
664  
665  
666  
667  
668  
669  
670  
671  
672  
673  
674  
675  
676  
677  
678  
679  
680  
681  
682  
683  
684  
685  
686  
687  
688  
689  
690  
691  
692  
693  
694  
695  
696  
697  
698  
699  
690  
691  
692  
693  
694  
695  
696  
697  
698  
699  
700  
701  
702  
703  
704  
705  
706  
707  
708  
709  
7010  
7011  
7012  
7013  
7014  
7015  
7016  
7017  
7018  
7019  
7020  
7021  
7022  
7023  
7024  
7025  
7026  
7027  
7028  
7029  
7030  
7031  
7032  
7033  
7034  
7035  
7036  
7037  
7038  
7039  
7040  
7041  
7042  
7043  
7044  
7045  
7046  
7047  
7048  
7049  
7050  
7051  
7052  
7053  
7054  
7055  
7056  
7057  
7058  
7059  
7060  
7061  
7062  
7063  
7064  
7065  
7066  
7067  
7068  
7069  
7070  
7071  
7072  
7073  
7074  
7075  
7076  
7077  
7078  
7079  
7080  
7081  
7082  
7083  
7084  
7085  
7086  
7087  
7088  
7089  
7090  
7091  
7092  
7093  
7094  
7095  
7096  
7097  
7098  
7099  
70100  
70101  
70102  
70103  
70104  
70105  
70106  
70107  
70108  
70109  
70110  
70111  
70112  
70113  
70114  
70115  
70116  
70117  
70118  
70119  
70120  
70121  
70122  
70123  
70124  
70125  
70126  
70127  
70128  
70129  
70130  
70131  
70132  
70133  
70134  
70135  
70136  
70137  
70138  
70139  
70140  
70141  
70142  
70143  
70144  
70145  
70146  
70147  
70148  
70149  
70150  
70151  
70152  
70153  
70154  
70155  
70156  
70157  
70158  
70159  
70160  
70161  
70162  
70163  
70164  
70165  
70166  
70167  
70168  
70169  
70170  
70171  
70172  
70173  
70174  
70175  
70176  
70177  
70178  
70179  
70180  
70181  
70182  
70183  
70184  
70185  
70186  
70187  
70188  
70189  
70190  
70191  
70192  
70193  
70194  
70195  
70196  
70197  
70198  
70199  
70200  
70201  
70202  
70203  
70204  
70205  
70206  
70207  
70208  
70209  
70210  
70211  
70212  
70213  
70214  
70215  
70216  
70217  
70218  
70219  
70220  
70221  
70222  
70223  
70224  
70225  
70226  
70227  
70228  
70229  
70230  
70231  
70232  
70233  
70234  
70235  
70236  
70237  
70238  
70239  
70240  
70241  
70242  
70243  
70244  
70245  
70246  
70247  
70248  
70249  
70250  
70251  
70252  
70253  
70254  
70255  
70256  
70257  
70258  
70259  
70260  
70261  
70262  
70263  
70264  
70265  
70266  
70267  
70268  
70269  
70270  
70271  
70272  
70273  
70274  
70275  
70276  
70277  
70278  
70279  
70280  
70281  
70282  
70283  
70284  
70285  
70286  
70287  
70288  
70289  
70290  
70291  
70292  
70293  
70294  
70295  
70296  
70297  
70298  
70299  
70200  
70201  
70202  
70203  
70204  
70205  
70206  
70207  
70208  
70209  
70210  
70211  
70212  
70213  
70214  
70215  
70216  
70217  
70218  
70219  
70220  
70221  
70222  
70223  
70224  
70225  
70226  
70227  
70228  
70229  
70230  
70231  
70232  
70233  
70234  
70235  
70236  
70237  
70238  
70239  
70240  
70241  
70242  
70243  
70244  
70245  
70246  
70247  
70248  
70249  
70250  
70251  
70252  
70253  
70254  
70255  
70256  
70257  
70258  
70259  
70260  
70261  
70262  
70263  
70264  
70265  
70266  
70267  
70268  
70269  
70270  
70271  
70272  
70273  
70274  
70275  
70276  
70277  
70278  
70279  
70280  
70281  
70282  
70283  
70284  
70285  
70286  
70287  
70288  
70289  
70290  
70291  
70292  
70293  
70294  
70295  
70296  
70297  
70298  
70299  
70200  
70201  
70202  
70203  
70204  
70205  
70206  
70207  
70208  
70209  
70210  
70211  
70212  
70213  
70214  
70215  
70216  
70217  
70218  
70219  
70220  
70221  
70222  
70223  
70224  
70225  
70226  
70227  
70228  
70229  
70230  
70231  
70232  
70233  
70234  
70235  
70236  
70237  
70238  
70239  
70240  
70241  
70242  
70243  
70244  
70245  
70246  
70247  
70248  
70249  
70250  
70251  
70252  
70253  
70254  
70255  
70256  
70257  
70258  
70259  
70260  
70261  
70262  
70263  
70264  
70265  
70266  
70267  
70268  
70269  
70270  
70271  
70272  
70273  
70274  
70275  
70276  
70277  
70278  
70279  
70280  
70281  
70282  
70283  
70284  
70285  
70286  
70287  
70288  
70289  
70290  
70291  
70292  
70293  
70294  
70295  
70296  
70297  
70298  
70299  
70200  
70201  
70202  
70203  
70204  
70205  
70206  
70207  
70208  
70209  
70210  
70211  
70212  
70213  
70214  
70215  
70216  
70217  
70218  
70219  
70220  
70221  
70222  
70223  
70224  
70225  
70226  
70227  
70228  
70229  
70230  
70231  
70232  
70233  
70234  
70235  
70236  
70237  
70238  
70239  
70240  
70241  
70242  
70243  
70244  
70245  
70246  
70247  
70248  
70249  
70250  
70251  
70252  
70253  
70254  
70255  
70256  
70257  
70258  
70259  
70260  
70261  
70262  
70263  
70264  
70265  
70266  
70267  
70268  
70269  
70270  
70271  
70272  
70273  
70274  
70275  
70276  
70277  
70278  
70279  
70280  
70281  
70282  
70283  
70284  
70285  
70286  
70287  
70288  
70289  
70290  
70291  
70292  
70293  
70294  
70295  
70296  
70297  
70298  
70299  
70200  
70201  
70202  
70203  
70204  
70205  
70206  
70207  
70208  
70209  
70210  
70211  
70212  
70213  
70214  
70215  
70216  
70217  
70218  
70219  
70220  
70221  
70222  
70223  
70224  
70225  
70226  
70227  
70228  
70229  
70230  
70231  
70232  
70233  
70234  
70235  
70236  
70237  
70238  
70239  
70240  
70241  
70242  
70243  
70244  
70245  
70246  
70247  
70248  
70249  
70250  
70251  
70252  
70253  
70254  
70255  
70256  
70257  
70258  
70259  
70260  
70261  
70262  
70263  
70264  
70265  
70266  
70267  
70268  
70269  
70270  
70271  
70272  
70273  
70274  
70275  
70276  
70277  
70278  
70279  
70280  
70281  
70282  
70283  
70284  
70285  
70286  
70287  
70288  
70289  
70290  
70291  
70292  
70293  
70294  
70295  
70296  
70297  
70298  
70299  
70200  
70201  
70202  
70203  
70204  
70205  
70206  
70207  
70208  
70209  
70210  
70211  
70212  
70213  
70214  
70215  
70216  
70217  
70218  
70219  
70220  
70221  
70222  
70223  
70224  
70225  
70226  
70227  
70228  
70229  
70230  
70231  
70232  
70233  
70234  
70235  
70236  
70237  
70238  
70239  
70240  
70241  
70242  
70243  
70244  
70245  
70246  
70247  
70248  
70249  
70250  
70251  
70252  
70253  
70254  
70255  
70256  
70257  
70258  
70259  
70260  
70261  
70262  
70263  
70264  
70265  
70266  
70267  
70268  
70269  
70270  
70271  
70272  
70273  
70274  
70275  
70276  
70277  
70278  
70279  
70280  
70281  
70282  
70283  
70284  
70285  
70286  
70287  
70288  
70289  
70290  
70291  
70292  
70293  
70294  
70295  
70296  
70297  
70298  
70299  
70200  
70201  
70202  
70203  
70204  
70205  
70206  
70207  
70208  
70209  
70210  
70211  
70212  
70213  
70214  
70215  
70216  
70217  
70218  
70219  
70220  
70221  
70222  
70223  
70224  
70225  
70226  
70227  
70228  
70229  
70230  
70231  
70232  
70233  
70234  
70235  
70236  
70237  
70238  
70239  
70240  
70241  
70242  
70243  
70244  
70245  
70246  
70247  
70248  
70249  
70250  
70251  
70252  
70253  
70254  
70255  
70256  
70257  
70258  
70259  
70260  
70261  
70262  
70263  
70264  
70265  
70266  
70267  
70268  
70269  
70270  
70271  
70272  
70273  
70274  
70275  
70276  
70277  
70278  
70279  
70280  
70281  
70282  
70283  
70284  
70285  
70286  
70287  
70288  
70289  
70290  
70291  
70292  
70293  
70294  
70295  
70296  
70297  
70298  
70299  
70200  
70201  
70202  
70203  
70204  
70205  
70206  
70207  
70208  
70209  
70210  
70211  
70212  
70213  
70214  
70215  
70216  
70217  
70218  
70219  
70220  
70221  
70222  
70223  
70224  
70225  
70226  
70227  
70228  
70229  
70230  
70231  
70232  
70233  
70234  
70235  
70236  
70237  
70238  
70239  
70240  
70241  
70242  
70243  
70244  
70245  
70246  
70247  
70248  
70249  
70250  
70251  
70252  
70253  
70254  
70255  
70256  
70257  
70258  
70259  
70260  
70261  
70262  
70263  
70264  
70265  
70266  
70267  
70268  
70269  
70270  
70271  
70272  
70273  
70274  
70275  
70276  
70277  
70278  
70279  
70280  
70281  
70282  
70283  
70284  
70285  
70286  
70287  
70288  
70289  
70290  
70291  
70292  
70293  
70294  
70295  
70296  
70297  
70298  
70299  
70200  
70201  
70202  
70203  
70204  
70205  
70206  
70207  
70208  
70209  
70210  
70211  
70212  
70213  
70214  
70215  
70216  
70217  
70218  
70219  
70220  
70221  
70222  
70223  
70224  
70225  
70226  
70227  
70228  
70229  
70230  
70231  
70232  
70233  
70234  
70235  
70236  
70237  
70238  
70239  
70240  
70241  
70242  
70243  
70244  
70245

1 Pursuant to Civil L.R. 16-8 and ADR L.R. 3-5, counsel report that they have met and  
2 conferred regarding ADR and have reached the following stipulation:

3 On August 29, 2011, three shareholder derivative actions were filed purportedly on  
4 behalf of Google Inc. ("Google"). The parties subsequently filed a Stipulation and [Proposed]  
5 Order Consolidating Actions and Appointing Lead Counsel, which was entered by the Court on  
6 September 19, 2011 ("September 19, 2011 Order"). Pursuant to the schedule set in the  
7 September 19, 2011 Order, plaintiffs' Consolidated Amended Complaint is due to be filed on  
8 October 24, 2011. Defendants intend to file motions to dismiss asserting, among other things,  
9 that plaintiffs lack standing to pursue this action. In light of the current procedural posture, the  
10 parties respectfully believe that the ADR certification and selection process is premature at this  
11 time, particularly given that the operative complaint has not yet been filed and the exact  
12 identities of the parties is not yet known. The parties agree that private mediation at some point  
13 during the course of this litigation may be appropriate if the Court finds that plaintiffs have  
14 standing and that the yet to be filed operative complaint states a claim.

15

16 Dated: October 18, 2011

Respectfully submitted,

17

18 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
650 Page Mill Road  
Palo Alto, CA 94304-1050

19

20

21

By: /s/ Elizabeth C. Peterson  
Elizabeth C. Peterson

22

23 Attorneys for Defendants and Nominal  
Defendant Google Inc.

24

25

26

27

28

1 Dated: October 18, 2011

Respectfully submitted,

2 ROBBINS GELLER RUDMAN  
3 & DOWD LLP  
4 DARREN J. ROBBINS  
TRAVIS E. DOWNS III  
BENNY C. GOODMAN III  
ERIK W. LUEDEKE

6 By: /s/ Travis E. Downs III

7 Travis E. Downs III

8 655 West Broadway, Suite 1900  
9 San Diego, CA 92101-3301  
Telephone: 619/231-1058  
619/231-7423 (fax)

10 ROBBINS GELLER RUDMAN  
11 & DOWD LLP  
12 SHAWN A. WILLIAMS  
Post Montgomery Center  
13 One Montgomery Street, Suite 1800  
San Francisco, CA 94104  
Telephone: 415/288-4545  
415/288-4534 (fax)

15 POMERANTZ HAUDEK GROSSMAN  
16 & GROSS LLP  
17 MARC I. GROSS  
JEREMY A. LIEBERMAN  
JASON S. COWART  
FEI-LU QIAN  
18 100 Park Avenue  
New York, NY 10017-5516  
Telephone: 212/661-1100  
212/661-8665 (fax)

20 POMERANTZ HAUDEK GROSSMAN  
21 & GROSS LLP  
22 PATRICK V. DAHLSTROM  
Ten South La Salle Street, Suite 3505  
23 Chicago, IL 60603  
Telephone: 312/377-1181  
312/377-1184 (fax)

24 Lead Attorneys for Plaintiffs

26 *I, Elizabeth C. Peterson, am the ECF user whose ID and password are being used to file this  
27 STIPULATION AND [PROPOSED] ORDER REGARDING ADR CERTIFICATION AND  
SELECTION PROCESS. In compliance with General Order 45, X.B., I hereby attest that Travis  
E. Downs III has concurred in this filing.*

28 STIPULATION AND [PROPOSED]  
ORDER RE ADR CERTIFICATION AND  
SELECTION PROCESS  
MASTER FILE NO. CV-11-04248-PJH

## ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 10/25/11

